

Region 3 GPRA Baseline RCRA Corrective Action Facility

Wood Preservers, Inc.

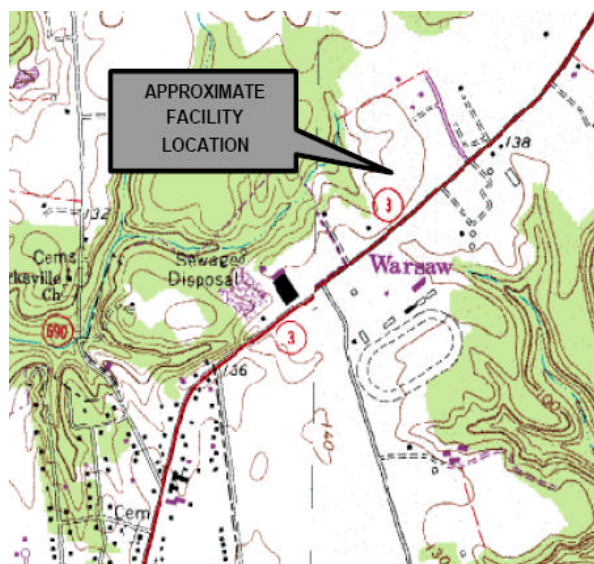
Route 3 North

Warsaw, Virginia 22572

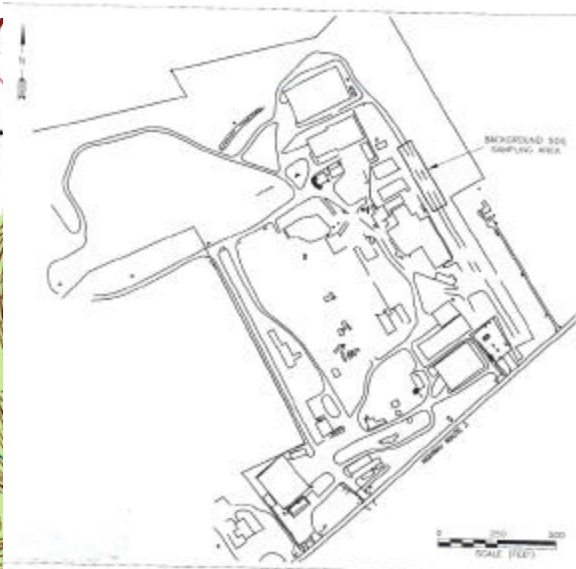
Congressional District 3

EPA ID #: VAD003113750

Updated January 4, 2008



Facility Location Map
(Scale: 1 inch = 2,400 ft approx.)



Facility Site Plan
(Scale: 1 inch = 800 ft approx.)

Current RCRA CA Activities

The Virginia Department of Environmental Quality (DEQ) is the lead agency for oversight of Corrective Action (CA) work at the facility under the Resource Conservation and Recovery Act (RCRA).

The CA investigations and any necessary clean up activities at the facility are being implemented in accordance with the conditions and requirements of a Consent Order (CO) issued by the Commonwealth of Virginia, DEQ, to the facility owner with an effective date of September 30, 1994. The CO was modified in 1998 to include the requirements of a Post-Closure Plan. The CO and Post-Closure Plan were issued in lieu of issuing a Post-Closure Permit to the facility.

CA investigations and necessary clean up activities are also being implemented in accordance with a voluntary Facility Lead Agreement (FLA) that was signed between Wood Preservers, Inc. (WPI) and the U. S. EPA on August 9, 2002. The DEQ has been delegated by the EPA as the lead agency for oversight of the FLA.

WPI performed Interim Measures (IMs) consisting of in-situ treatment of Hexavalent Chromium in the Former Process Area (AOC-2). An IM Report for Hexavalent Chromium Treatment for the AOC-2 Old Treatment Plant Area, dated January 2007, documented conversion of Hexavalent Chromium to trivalent chromium and included results of soil samples taken beneath the Former Process Area. Arsenic remains a constituent of concern (COC) which needs to be addressed at AOC-2.

On December 19, 2007, the DEQ granted conditional approval to allow the Wood Preservers, Inc. (WPI) facility to install a system of groundwater wells to provide Demonstration Testing for the Biological Degradation of COCs in soil and groundwater for the Closed Surface Impoundment (SWMU-1).

The DEQ is working with WPI in an effort to achieve a risk-based closure for the Closed Spray Evaporation Pond (SWMU-2). The DEQ is working with WPI to achieve a risk-based clean up for the Old Treatment Plant Area (ACO-2).

Site Description

WPI operates a wood treating facility in Warsaw, VA. The facility began operations in 1975 and is a fully integrated wood preserving plant. Raw wood is transported to the site, cut, debarked, and milled to the desired product.

Pentachlorophenol (an “oil-borne” process) was used at the old treating area of the facility between 1975 and 1983. Creosote and chromated copper arsenate (CCA) were also used as wood preservatives at the old treating area. The wood is currently preserved using a “water-borne” CCA process with Dricon, a water-borne fire retardant with boron as the primary ingredient.

The WPI facility uses pressurized treating cylinders to apply the CCA preservative solution. Before leaving the treatment cylinder, excess preservative is drawn from the wood using a vacuum system. The treated wood is removed from the treating cylinder and allowed to dry in a covered area with a concrete floor constructed with an underlying synthetic liner in accordance with RCRA Subpart W regulations (RCRA Subpart W “drip pad”).

Two solid waste management units (SWMUs), SWMU-1, Closed Surface Impoundment (SI), and SWMU-2, Closed Spray Evaporation Pond (SEP), were closed in 1988 as landfills because clean closure under the RCRA could not be demonstrated.

The wood preserving operations in the Old Process Building designated as Area of Concern-2 (AOC-2), the Old Treatment Plant Area, were terminated prior to the December 24, 1992, the effective date of the 40 CFR 265 Subpart W unit specific drip pad facility requirements. Because operation in the AOC-2, Old Treatment Plant Area, was terminated prior to December 24, 1992, the AOC-2, Old Treatment Plant Area, is not subject to closure requirements under the RCRA Subpart W unit specific drip pad facility requirements.

A Consent Order (CO) was issued by the Commonwealth of Virginia, DEQ, to the facility owner with an effective date of September 30, 1994.

A groundwater treatment and extraction system has been operational at the facility since the 1980's to contain a contaminant plume related to releases from the facility's former surface impoundments. Continued operation of the groundwater treatment and extraction system is required by the terms of the Consent Order issued by the Commonwealth in 1994 and modified in 1998, to address the regulated units (SWMUs 1 and 2).

A Facility Lead Agreement was signed August 9, 2002, between WPI and the U. S. EPA.

A draft RCRA Facility (RFI) Work Plan, dated October 1, 2001, was developed in accordance with U.S. EPA guidance. The Closed Surface Impoundment (SWMU 1), the Closed Spray Evaporation Pond (SWMU 2), the Former Drip Pad (area of concern (AOC-1)), and the Old Treating Plant Area (AOC-2) are areas of primary concern.

RCRA CA Milestones

The following RCRA corrective action (CA) milestones have been achieved at this facility:

- WPI submitted an application, dated May 5, 1988, for a post closure permit covering the maintenance and monitoring of one capped surface impoundment (SWMU-1) and one capped spray evaporation impoundment (SWMU-2), each containing K001 sludge. WPI was using creosote and CAA solution in its wood treatment process at this time.
- The capped surface impoundment and capped spray evaporation impoundment were certified closed on September 19, 1988.
- A Consent Order (CO) to address CA was issued by the Commonwealth and signed by facility owner on September 29, 2004. The CO was modified September 28, 1998, to incorporate a Post-Closure Plan as Appendix A of the CO.
- WPI entered into a RCRA Corrective Action Facility Lead Agreement with the DEQ and the United States Environmental Protection Agency (U.S.EPA) in August 2002.
- Human Exposures Under Control Determination was accepted by DEQ on September 27, 2001.
- WPI submitted a draft RFI Work Plan dated October 1, 2001.

- The RCRA Facility Investigation (RFI) Work Plan was approved November 18, 2002. This RFI Work Plan includes all activities required for an RFA and a RFI.
- The RFI Report was submitted to the DEQ in June 2003, and a supplemental RFI Work Plan including the addition of two groundwater monitoring wells and the collection of samples for pre-design evaluation was submitted in 2003. The additional field work was performed in April 2005.
- A revised April 2005 Work Plan for Closure Evaluation, Closed Surface Impoundment and Closed Spray Evaporation Pond was approved by DEQ on April 25, 2005.
- An Interim Measures (IM) Work Plan for Hexavalent Chromium at AOC-2, Old Treating Plant Area, dated August 23, 2005, was approved by DEQ on August 30, 2005.
- WPI completed an interim measure (IM) consisting of in-situ treatment of Hexavalent Chromium in the Former Process Area designated as AOC 2, Old Treating Plant Area. This IM began in late summer 2005, and followed the IM Workplan approved by DEQ on April 25, 2005.
- A Risk-Based Closure Demonstration for the Closed Spray Evaporation Pond, dated October 2006, was received by DEQ on October 24, 2006. DEQ issued a Notice of Deficiency comments in a letter dated January 4, 2007, stating that risk based factors in State of Virginia Risk Assessment Guidance must be met for a Risk-Based Closure.
- An IM Report Hexavalent Chromium Treatment for the AOC-2 Old Treatment Plant Area, dated January 2007, documented conversion of hexavalent chromium to trivalent chromium and included results of soil samples taken beneath the Former Process Area. Arsenic remains a constituent of concern (COC) which needs to be addressed at AOC-2.
- WPI submitted a Work Plan – Demonstration Testing for the Biological Degradation of Soil and Groundwater, dated November 7, 2007, for the SWMU-1, Closed Surface Impoundment. This Work Plan was conditionally approved by DEQ in letter dated December 19, 2007, based on submission of an Operation and Maintenance Plan and initial Progress Report within 60 days of beginning field activities.

Environmental Indicator Status

Under the Government Performance and Results Act (GPRA), EPA has set national goals to address

high priority RCRA Corrective Action facilities by the year 2005. The EPA is evaluating two key Environmental Indicators (EIs) for each facility: Current Human Exposures Under Control and Migration of Contaminated Groundwater Under Control. This facility is one of EPA Region III's high priority facilities and falls under this initiative.

Virginia's current evaluation of Environmental Indicators for this facility is as follows:

- *Human Exposures Controlled Determination:* The DEQ has made the EI determination of "yes, that current human exposures are under control." The above determination is based upon the DEQ's Current Human Health Environmental Indicator (HHEI) Determination Report, CA725, dated September 16, 2003. This above HHEI determination is considered current, effective January 4, 2008.
- *Release to Groundwater Controlled Determination:* The DEQ has made the EI determination of "yes, that migration of contaminated groundwater is under control," based upon the review of CA information for the CCP site contained in the EI determination Report, CA750, dated September 27, 2002. The above EI determination indicates that the migration of "contaminated" groundwater is believed to be under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater." In support of the EI process, the facility is currently attempting to demonstrate a risk-based closure for SWMU No. 1, the Closed Spray Evaporation Pond, to meet closure performance standards for soils for this closed RCRA Unit. This EI determination is considered current, effective January 4, 2008.

Contaminants

The predominant soil and groundwater contaminants are chromium, arsenic, chrysene, benz(a)anthracene, acenaphthene, fluorene, 2,4-dinitrotoluene, and pyrene.

Institutional Controls

A Consent Order (CO) was issued by the Commonwealth of Virginia, DEQ, to the facility owner with an effective date of September 30, 1994. The CO was modified in 1998 to include the requirements of a Post-Closure Plan. The CO and Post-Closure Plan were issued in lieu of issuing a Post-Closure Permit to the facility.

Deed Notices are recorded which identify the location of surface impoundments that have been closed as landfills with waste closed in place.

Community Involvement

The facility printed a public notice on March 12, 2003 in the *Northern Neck News*, stating that Wood Preservers is conducting a study of its facility in accordance with the RCRA CA Program. The public notice invited the public to review all pertinent information regarding the study.

A document repository has been established at the following location:

Richmond County Library
Rappahannock Community College, Warsaw Campus
52 Campus Drive, Warsaw, VA 22572
Phone: (804) 333-6710

Documentation may be reviewed during normal operating hours.

Government Contact

The Virginia DEQ is the lead CA regulatory authority for this project. Please contact the DEQ project manager listed below for details on this project or the contents of this fact sheet.

DEQ Project Manager

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For more information about the EPA corrective action program, including Environmental Indicators, please visit the EPA website at: www.epa.gov/reg3wcmd/correctiveaction.htm

Facility Contact

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Fact Sheet Updates

The previous fact sheet was updated July 2007. The next update is scheduled for July 2008. Previous fact sheets may be obtained through the DEQ contact.